

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

1661, INC. d/b/a GOAT, a Delaware
corporation,

Plaintiff,

v.

GOATLIFT, LLC, an Ohio limited liability
company; and DOES 1-100,

Defendants.

Case No.: 2:24-cv-00078-MHW-KAJ

Judge: Hon. Michael H. Watson

REQUEST FOR ENTRY OF DEFAULT

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, Plaintiff 1661, Inc. d/b/a GOAT (“GOAT”) respectfully requests that the Clerk enter default in this matter against Defendant Goatlift, LLC (“Defendant”). Defendant has failed to appear, answer, or otherwise respond to GOAT’s Complaint.

1. GOAT filed its Complaint against Defendant on January 9, 2024. *See* Dkt. No. 2.
2. On January 10, 2024, Defendant was served with the Summons and Complaint via its agent for service of process, United States Corporation Agents, Inc. *See* Dkt. No. 5.
3. Defendant’s response to the Complaint was due January 31, 2024. *See* Declaration of Kevin T. Shook in Support of Request for Entry of Default ¶ 4. Defendant failed to file a response by this deadline. *Id.*
4. To date, Defendant has not appeared, answered, or otherwise responded to the Complaint. *Id.* ¶ 5.

Accordingly, GOAT, respectfully requests that the Clerk enter Default against Defendant Goatlift, LLC.

Dated: February 5, 2024

/s/ Kevin T. Shook

Kevin T. Shook (0073718) (Trial Attorney)

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2/5/2024

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**DECLARATION OF KEVIN T. SHOOK IN SUPPORT
OF REQUEST FOR ENTRY OF DEFAULT**

I, Kevin T. Shook, declare as follows:

1. I am a partner with the law firm of Frost Brown Todd LLP, counsel for Plaintiff 1661, Inc. d/b/a GOAT (“GOAT”) in this action. I am licensed to practice law in the State of Ohio and admitted before this Court.

2. GOAT filed its Complaint against Defendant Goatlift, LLC (“Defendant”) on January 9, 2024. *See* Dkt. No. 2.

3. On January 10, 2024, Defendant was served with the Summons and Complaint via its agent for service of process, United States Corporation Agents, Inc. *See* Dkt. No. 5.

4. Defendant’s response to the Complaint was due January 31, 2024. Defendant failed to file a response by this deadline.

5. To date, Defendant has not appeared, answered, or otherwise responded to the Complaint.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5th day of February, 2024 at Columbus, Ohio.



Kevin T. Shook

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2/5/2024